FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY and INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

Sports Graphics
3423 Park Davis Circle
Indianapolis, Indiana 46236

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-12652-00318	
Issued by:	Issuance Date:
Daniel B. Dovenbarger Administrator, ERMD City of Indianapolis	Expiration Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Environmental Resources Management Division (ERMD). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a Stationary Printing Operation.

Authorized individual:	John Kerner
Source Address:	3423 Park Davis Circle Indianapolis, In. 46236
Mailing Address:	3423 Park Davis Circle Indianapolis, Indiana 46236
SIC Code:	2759
Source Location Status:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD or Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) Heidelberg Offset Lithographic 5 Color Press, identified as EU 1, installed October 1995, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches , using no controls, and exhausting to the inside the building.

(b) One (1) Meihle Roland Offset Lithographic 6 Color Press, identified as EU2, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.

(c) One (1) Meihle Offset Lithographic 4 Color Press, identified as EU3, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.

(d) One (1) Heidelberg SORTZ Offset Lithographic 2 Color Press, identified as EU4, installed in October 1995, with a maximum line speed of 400 feet per minute, and a maximum printing width of 24 inches, using no controls, and exhausting to the inside of the building.

(e) One (1) Heidelberg GTO Offset Lithographic Press, identified as EU5, installed in October 1995, with a maximum line speed of 222.22 feet per minute, and a maximum printing width of 14 inches, using no controls, and exhausting to the inside of the building.

(f) One (1) Heidelberg KORS Offset Lithographic 4 Color Press, identified as EU6, installed in October 1995, with a maximum line speed of 194.44 feet per minute, and a maximum

printing width of 20 inches, using no controls, and exhausting to the inside of the building.

(g) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU7, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.

(h) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU8, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.

(i) One (1) Heidelberg Windmill Lithographic Letter Press, identified as EU9, installed in October 1995, with a maximum line speed of 62.5 feet per minute, and a maximum printing width of 10 inches, using no controls, and exhausting to the inside of the building.

(j) One (1) Harris 110 Web Heatset Lithographic Press, identified as EU10, installed in October 1995, with a maximum line speed of 986 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.

(k) One (1) Color King Web Non Heatset Lithographic Press, identified as EU12, installed in January 2000, with a maximum line speed of 389 feet per minute, and a maximum printing width of 36 inches, using no controls, and exhausting to Stack 1.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) The following Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) 1.25 MMBtu/ hr Web Press Gas Dryer, identified as EU 11, and venting to stack Number 1.

(b) Paved and unpaved roads and parking lots with public access.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Environmental Resources Management Division (ERMD) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, and ERMD shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and ERMD, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by and ERMD.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)][326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Permits
Air Quality Management Section

2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, and ERMD within a reasonable time, any information that IDEM, OAQ, and ERMD may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and ERMD may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal, requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the

status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15th of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and ERMD may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Compliance
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, and ERMD upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and ERMD. IDEM, OAQ, and ERMD may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and/or ERMD makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and/or ERMD within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other

requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and ERMD, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

ERMD
Telephone No.: 317/327-2234
Facsimile No.: 317/327-2274

Failure to notify IDEM, OAQ and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ and ERMD, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ and ERMD, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do

not need to be included in this report.

The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or ERMD determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ or ERMD, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or ERMD, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ ERMD and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this

source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resource Management Division, Permits
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.

(2) If IDEM, OAQ and ERMD upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and ERMD takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and ERMD, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Permits
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC

2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and ERMD, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC-13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and ERMD U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Permits
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, and ERMD, within thirty (30) calendar days of receipt of a billing pursuant to 326 IAC 2-7-19(b). If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Asbestos
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division, Compliance
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and ERMD not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and ERMD, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for new emission units, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and/or ERMD makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and/or ERMD within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resource Management Division
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report shall cover the period commencing on the date of issuance of this permit

and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) Heidelberg Offset Lithographic 5 Color Press, identified as EU 1, installed October 1995, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches , using no controls, and exhausting to the inside the building.

(b) One (1) Meihle Roland Offset Lithographic 6 Color Press, identified as EU2, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.

(c) One (1) Meihle Offset Lithographic 4 Color Press, identified as EU3, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.

(d) One (1) Heidelberg SORTZ Offset Lithographic 2 Color Press, identified as EU4, installed in October 1995, with a maximum line speed of 400 feet per minute, and a maximum printing width of 24 inches, using no controls, and exhausting to the inside of the building.

(e) One (1) Heidelberg GTO Offset Lithographic Press, identified as EU5, installed in October 1995, with a maximum line speed of 222.22 feet per minute, and a maximum printing width of 14 inches, using no controls, and exhausting to the inside of the building.

(f) One (1) Heidelberg KORS Offset Lithographic 4 Color Press, identified as EU6, installed in October 1995, with a maximum line speed of 194.44 feet per minute, and a maximum printing width of 20 inches, using no controls, and exhausting to the inside of the building.

(g) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU7, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.

(h) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU8, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.

(i) One (1) Heidelberg Windmill Lithographic Letter Press, identified as EU9, installed in October 1995, with a maximum line speed of 62.5 feet per minute, and a maximum printing width of 10 inches, using no controls, and exhausting to the inside of the building.

(j) One (1) Harris 110 Web Heatset Lithographic Press, identified as EU10, installed in October 1995, with a maximum line speed of 986 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.

(k) One (1) Color King Web Non Heatset Lithographic Press, identified as EU12, installed in January 2000, with a maximum line speed of 389 feet per minute, and a maximum printing width of 36 inches, using no controls, and exhausting to Stack 1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOCs)[326 IAC 8][326 IAC 2-7-2]

The VOC usage of each emitting unit with a potential to emit greater than 25 tons per year of VOC and which are not covered by any other provisions of 326 IAC 8, (EU1, EU2, EU3, EU4, EU10, and EU12) shall be limited as specified below. The total VOC usage of all emitting units (EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, and EU12) shall be limited to less than 100 tons per rolling 12 month consecutive period so that the source-wide VOC emissions shall not exceed 100 tons per year, such that the Part 70 Operating Permit Regulation 326 IAC 2-7-2 shall not apply.

(a) The Volatile Organic Compound usage from emitting unit EU1 shall be less than 25 tons per rolling 12 month consecutive period so that the VOC emissions for each individual emitting unit that has the potential to emit more than 25 tons per year of VOCs so that emissions from each unit do not equal or exceed 25 tons per year, and therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.

(b) The Volatile Organic Compound usage from emitting unit EU2 shall be less than 25 tons per rolling 12 month consecutive period so that the VOC emissions for each individual emitting unit that has the potential to emit more than 25 tons per year of VOCs so that emissions from each unit do not equal or exceed 25 tons per year, and therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.

(c) The Volatile Organic Compound usage from emitting unit EU3 shall be less than 25 tons per rolling 12 month consecutive period so that the VOC emissions for each individual emitting unit that has the potential to emit more than 25 tons per year of VOCs so that emissions from each unit do not equal or exceed 25 tons per year, and therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply..

(d) The Volatile Organic Compound usage from emitting unit EU4 shall be less than 25 tons per rolling 12 month consecutive period so that the VOC emissions for each individual emitting unit that has the potential to emit more than 25 tons per year of VOCs so that emissions from each unit do not equal or exceed 25 tons per year, and therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.

(e) The Volatile Organic Compound usage from emitting unit EU10 shall be less than 25 tons per rolling 12 month consecutive period so that the VOC emissions for each individual emitting unit that has the potential to emit more than 25 tons per year of VOCs so that emissions from each unit do not equal or exceed 25 tons per year, and therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.

(f) The Volatile Organic Compound usage from emitting unit EU12 shall be less than 25 tons per rolling 12 month consecutive period so that the VOC emissions for each individual emitting unit that has the potential to emit more than 25 tons per year of VOCs so that emissions from each unit do not equal or exceed 25 tons per year, and therefore, the best available control technology (BACT) requirements in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply..

D.1.2 Hazardous Air Pollutants (HAPs)[326 IAC 2-7-2]

The total combined HAP usage of all emitting units shall be limited to less than 25 tons per rolling 12 month consecutive period so that the source-wide emissions shall be less than 25 tons per year of combined HAPs. The individual HAP usage of all emitting units shall be limited to less than 10 tons per rolling 12 month period of individual HAPs so that the source-wide emissions shall be less than 10 tons per year of individual HAPs. These limits are established so that the Part 70 Operating Permit Regulation 326 IAC 2-7-2 shall not apply.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC)

(a) Compliance with the VOC usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, and ERMD reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month.

D.1.4 Hazardous Air Pollutants (HAPs)

(a) Compliance with the HAP usage limitations contained in Conditions D.1.2 shall be determined using formulation data supplied by the coating manufacturer.

(b) Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total individual hazardous air pollutant usage and total combined hazardous air pollutant usage for the most recent month. Individual HAP's to be included in this determination are all of those which have the potential of exceeding 10 tons per year in usage.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.2.

(1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month

(4) The total HAP usage for each month; and

(5) The weight of HAPs emitted for each compliance period.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Sports Graphics
Source Address: 3423 Park Davis Circle
Indianapolis, In.46236
Mailing Address: 3423 Park Davis Circle
Indianapolis, In. 46236
FESOP No.: 097-12652-00318

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967
CITY OF INDIANAPOLIS - ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
DATA COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone:317-327-2234
Fax:317-327-2274

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Source Name: Sports Graphics
Source Address: 3423 Park Davis Circle
Indianapolis, In.46236
Mailing Address: 3423 Park Davis Circle
Indianapolis, In. 46236
FESOP No.: 097-12652-00318

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

Send Original to :
City of Indianapolis
E.R.M.D.
Air Quality Compliance Data Group
2700 S. Belmont Ave.
Indianapolis, Indiana 46221-2097
Phone 317 / 327-2234 Fax: 317 / 327- 2274

Send copy to :
Indiana Dept. Of Environmental Management
Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

FESOP Quarterly Report

Source Name: Sports Graphics
Source Address: 3423 Park Davis Circle
Indianapolis, In.46236
Mailing Address: 3423 Park Davis Circle
Indianapolis, In. 46236
FESOP No.: 097-12652-00318
Facility: EU1, EU2, EU3, EU4, EU10, and EU12
Parameter: Individual VOC Emissions
Limit: Less than 25 tons per rolling consecutive 12 month period for each unit

Quarter_____Year_____

Emitting Unit	VOC Emissions (tons/rolling 12 month period)		
	Month	Month	Month
EU-1			
EU-2			
EU-3			
EU-4			
EU-10			
EU-12			
Total			

9 No deviation occurred in this month

9 Deviation/s occurred in this month. Deviation has been reported on:_____

The filing of such information is mandated by Federal, State, and Local Air Pollution Legislation.
Violation of this mandate through omission or false information may be subject to penalty.

I hereby certify that the information contained in this notification is complete and accurate to the best of my knowledge.

Submitted by:_____Title/Position:_____
(Print/ Type)

Signature:_____Date:_____

Send Original to :
City of Indianapolis
E.R.M.D.
Air Quality Compliance Data Group
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FESOP Quarterly Report

Source Name: Sports Graphics
Source Address: 3423 Park Davis Circle
Indianapolis, In.46236
Mailing Address: 3423 Park Davis Circle
Indianapolis, In. 46236
FESOP No.: 097-12652-00318
Facility: EU1, EU2, EU3, EU4,E-5, E-6, E-7, E-8, E-9, EU10, and EU12
Parameter: Individual and Combined HAP Emissions
Limit: Less than 10 tons per rolling consecutive 12 month period for individual HAPs, Less than 25 tons per rolling consecutive 12 month period for Combined HAPs.

Quarter_____Year_____

Month	Highest emissions of an individual HAP (Tons/Month)	Emissions of all HAPs (Tons/Month)

Equation: HAP emissions (tons/month

j **[*density* (*lbs*/*gal*) × *wt.*% *of HAP* × *gal. solvents*/*month*]**

9 No deviation occurred in this month

9 Deviation/s occurred in this month. Deviation has been reported on:_____

The filing of such information is mandated by Federal, State, and Local Air Pollution Legislation. Violation of this mandate through omission or false information may be subject to penalty.

I hereby certify that the information contained in this notification is complete and accurate to the best of my knowledge.
Submitted by:_____Title/Position:_____
(Print/ Type)

Signature:_____Date:_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
FESOP Quarterly Report

Source Name: Sports Graphics
Source Address: 3423 Park Davis Circle
Indianapolis, In.46236
Mailing Address: 3423 Park Davis Circle
Indianapolis, In. 46236
FESOP No.: 097-12652-00318
Facility: EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, and EU12
Parameter: Combined VOC Emissions
Limit: Less than 100 tons per rolling consecutive 12 month period

Quarter_____Year_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9No deviation occurred in this quarter.

9Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by:_____
Title / Position:_____
Signature:_____
Date:_____
Phone:_____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Sports Graphics
Source Address: 3423 Park Davis Circle
Indianapolis, In.46236
Mailing Address: 3423 Park Davis Circle
Indianapolis, In. 46236
FESOP No.: 097-12652-00318
Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ____________________

Title/Position: ____________________

Date: ____________________

Phone: ____________________

Attach a signed certification to complete this report

Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Environmental Resources Management Division

Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)

Source Background and Description

Source Name:	**Sports Graphics**
Source Location:	**3423 Park Davis Circle**
County:	**Marion**
SIC Code:	**2759**
Operation Permit No.:	**F097-12652-00318**
Permit Reviewer:	**Dana Armstrong**

The Office of Air Quality (OAQ) has reviewed a FESOP application from Sports Graphics relating to the operation of a stationary printing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) Heidelberg Offset Lithographic 5 Color Press, identified as EU 1, installed October 1995, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches , using no controls, and exhausting to the inside the building.

(b) One (1) Meihle Roland Offset Lithographic 6 Color Press, identified as EU2, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.

(c) One (1) Meihle Offset Lithographic 4 Color Press, identified as EU3, installed in 1996, with a maximum line speed of 388.88 feet per minute, and a maximum printing width of 40 inches, using no controls, and exhausting to the inside of the building.

(d) One (1) Heidelberg SORTZ Offset Lithographic 2 Color Press, identified as EU4, installed in October 1995, with a maximum line speed of 400 feet per minute, and a maximum printing width of 24 inches, using no controls, and exhausting to the inside of the building.

(e) One (1) Heidelberg GTO Offset Lithographic Press, identified as EU5, installed in October 1995, with a maximum line speed of 222.22 feet per minute, and a maximum printing width of 14 inches, using no controls, and exhausting to the inside of the building.

(f) One (1) Heidelberg KORS Offset Lithographic 4 Color Press, identified as EU6, installed in October 1995, with a maximum line speed of 194.44 feet per minute, and a maximum printing width of 20 inches, using no controls, and exhausting to the inside of the building.

(g) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU7, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.

(h) One (1) AB Dick 9850 Offset Lithographic Press, identified as EU8, installed in October 1995, with a maximum line speed of 250 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.

(i) One (1) Heidelberg Windmill Lithographic Letter Press, identified as EU9, installed in

October 1995, with a maximum line speed of 62.5 feet per minute, and a maximum printing width of 10 inches, using no controls, and exhausting to the inside of the building.

(j) One (1) Harris 110 Web Heatset Lithographic Press, identified as EU10, installed in October 1995, with a maximum line speed of 986 feet per minute, and a maximum printing width of 12 inches, using no controls, and exhausting to the inside of the building.

(k) One (1) Color King Web Non Heatset Lithographic Press, identified as EU12, installed in January 2000, with a maximum line speed of 389 feet per minute, and a maximum printing width of 36 inches, using no controls, and exhausting to Stack 1.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) The following Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) 1.25 MMBtu/ hr Web Press Gas Dryer, identified as EU 11, and venting to stack Number 1.

(b) Paved and unpaved roads and parking lots with public access.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) S 097-8788-00318, issued on June 28, 1998.

All conditions from previous approvals were incorporated into this FESOP except the following:

1. The total amount of volatile organic compounds (VOC) and hazardous air pollutants (HAP), as supplied, delivered to the surface coating operation shall not exceed the following:

   (a) the total amount of VOC shall not exceed two (2) tons per month,
   (b) the total amount of any single HAP shall not exceed eight hundred thirty-three (833) pounds per month, and
   (c) the total amount of any combination of HAP shall not exceed one (1) ton per month.

2. The source shall keep the following records of the surface coating operation:

   (a) the number of gallons of each solvent containing material used,
   (b) the VOC and HAP content (pounds per gallon, as supplied) of each solvent containing material used,
   (c) material safety data sheets (MSDS) for each solvent containing material used,
   (d) a monthly summation of VOC and HAP usage, and
   (e) purchase orders and invoices for each solvent containing material used.

   These records shall be kept for a minimum period of five (5) years, and shall be made available upon request of the Office of Air Quality (OAQ).

3. Particulate matter emissions shall be controlled by a dry filter system or an equivalent control device. The source shall operate the particulate control device at all times the surface coating operation is in operation in accordance with the manufacturer's specifications. A source shall be considered in compliance with this requirement provided the overspray is not visibly detectable at the exhaust or accumulated on the rooftops or on the ground.

4. Include with the annual notice required in Condition 1 of the General Requirements Section, an inventory listing of the monthly volatile organic compound (VOC) and hazardous air pollutant (HAP) totals, and the total VOC and HAP emissions for the previous twelve (12) months.

Reason not incorporated: Source no longer subject to 326 IAC 2-9 rules, since it is no longer subject to an SSOA.

Enforcement Issue

(a) IDEM is aware that the source wide VOC emissions are not in compliance with the following emission limitation:

(1) 326 IAC 2-9-2.5 (Industrial or commercial coating operations not subject to 326 IAC 8-2; graphic arts operations not subject to 326 IAC 8-5-5.)

The total amount of volatile organic compounds (VOC) and hazardous air pollutants (HAP), as supplied, delivered to the surface coating operation shall not exceed the following:

(a) the total amount of VOC shall not exceed two (2) tons per month,
(b) the total amount of any single HAP shall not exceed eight hundred thirty-three (833) pounds per month, and
(c) the total amount of any combination of HAP shall not exceed one (1) ton per month.

(b) IDEM is reviewing this matter and has taken appropriate action. The compliance schedule in this proposed permit will satisfy the requirements of the above stated requirement.

The source has the following enforcement actions pending:

(1) Notice of Violation issued on September 7, 2000 by ERMD for failure to provide an annual notice to the commissioner pursuant to Condition number B.1. of SSOA S097-8788-00318, and an exceedance of the emission limitation pursuant to Condition Number A.1 previously mentioned above.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on August 23, 2000. Additional information was received on September 18, 2000.

There was no notice of completeness letter mailed to the source.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	<100 tons per year
PM-10	<100 tons per year
SO_2	<100 tons per year
VOC	>100 tons per year
CO	<100 tons per year
NO_x	<100 tons per year

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
None	>10 tons per year
TOTAL	> 25 tons per year

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs are equal to or greater than 100 tons per year, therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects information from a table received on January 31, 1999 accompanying the SSOA annual notification.

Pollutant	Actual Emissions (tons/year)
PM	none
PM-10	none
SO_2	none
VOC	17.97
CO	none
NO_x	none
HAP (specify)	0.55

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
EU-1				<25(1)			
EU-2				<25(1)			
EU-3				<25(1)			
EU-4				<25(1)			
EU-5							
EU-6							
EU-7							
EU-8							
EU-9							
EU-10				<25(1)			
EU-12				<25(1)			
Insignificant Activities	0.065		0.003	0.028	0.115	0.55	
Total				<100(2)			<10(3) individual <25(3) combined

(1) So that each unit does not have emissions equal or greater than 25 tons per year so that 326 IAC 8-1-6 shall not apply, EU 1, EU2, EU3, EU4, EU10, and EU 12 are each limited to less than 25 tons of VOC usage per 12 month rolling period.

(2) So that the source-wide VOC emissions shall not be greater than or equal to 100 tons per year and the Part 70 Operating Permit Regulation 326 IAC 2-7-2 shall not apply, all significant emitting units (EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, and EU12) are limited to less than 100 tons per rolling 12 month period of VOC usage.

(3) All emitting units (EU1, EU2, EU3, EU4, EU5, EU6, EU7, EU8, EU9, EU10, and EU12) are limited to less than 25 tons per rolling 12 month period of total combined HAPs emissions and 10 tons per rolling 12 month period of total individual HAP emissions. These limits are such that the Part 70 Operating Permit Regulation 326 IAC 2-7-2 shall not apply.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO_2	maintenance
NO_x	maintenance
Ozone	maintenance
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) Affected facilities subject to 40 CFR 60 Subpart QQ applicability are publication rotagravure printing presses. All units used by the source are either offset lithography, heatset lithography, nonheatset lithography, or letterpress printing presses. None of these presses use a gravure cylinder such as is defined in Subpart QQ, so none of the facilities are publication rotogravure printing presses. 40 CFR 60 Subpart QQ is not applicable to this source. No other Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) are applicable to this source.

(b) An affected facility which falls under 40 CFR 63 Subpart KK applicability must meet the requirement of being a "new and existing facility that is a major source of hazardous air pollutant (HAP) as defined in 40 CFR 63.2." This is stated in 40 CFR 63.820. The source is limited to less than 25 tons per year of total combined HAPs and less than 10 tons per year of total individual HAPs. It is not a major source of HAP as defined in 40 CFR 63.2, and therefore 40 CFR Subpart KK does not apply to the source. No other National Emissions Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR 63) are applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 Annual Emissions Statement
Because the potential emissions for the source exceeds 10 tons per year of VOC and the source is located in Marion county, the source is required to submit an annual emissions statement pursuant to 326 IAC 2-6. Pursuant to 326 IAC 2-6, the annual emission statement is due April 15th of each year.

326 IAC 2-8 FESOP Regulation
The source's potential to emit (PTE) before restrictions exceed the major source threshold for VOCs and HAPs established in 236 IAC 2-7-2, however the actual VOC and HAP emissions are below the major source thresholds. Therefore this source qualifies for the FESOP program. This source has accepted the following restrictions on PTE for VOCs and HAPs to stay below the major source thresholds.

(a) This source is major for VOCs, consequently the emissions of VOCs from all from the eleven (11) presses and insignificant emitting activities are limited to less than 100 tons per rolling twelve month period such that 326 IAC 2-7 shall not apply. A value of 0.028 tons of VOCs per year, submitted by the source, was used for the web press gas dryer (one of the insignificant emitting activities). The other insignificant activity, paved and unpaved roads and parking lots with public access, was deemed impractical as a source of VOCs. Compliance with this emissions limit is based on limiting the VOC input to less than 100 tons per rolling 12 month period for the eleven (11) presses.

(b) The unrestricted PTE for this source is major for Glycol Ether since it exceeds 10 tons per year each, consequently the emissions of Glycol Ether are limited to less than 10 tons per year for eleven (11) presses and insignificant emitting activities combined such

that 326 IAC 2-7 shall not apply. The two insignificant activities, a web press gas dryer, and paved and unpaved roads and a parking lot with public access, are not themselves potential sources of HAPs. The web press gas dryer emissions are already accounted for in emission calculations for it's web press. Compliance with this emissions limit is based on limiting the usage of glycol ether to less than 10 tons per rolling 12 month period each for the eleven (11) presses and pre-press area.

(c) The unrestricted PTE for this source is major for a combination of HAPs, consequently the emissions for all HAPs combined are limited to less than 25 tons per rolling 12 month period for all emitting units and insignificant emitting activities. The two insignificant activities, a web press gas dryer, and paved and unpaved roads and a parking lot with public access, are not themselves potential sources of HAPs. The web press gas dryer emissions are already accounted for in emission calculations for it's web press. Compliance with this emissions limit is based on limiting the input of any combination of HAPs to less than 25 tons per rolling 12 month period for the eleven (11) presses.

326 IAC 5-1-2 Opacity Regulation
The opacity regulation applies as a generally applicable requirement.

State Rule Applicability - Individual Facilities

326 IAC 8 VOC Rules
None of the Lithographic Presses covered in this permit are subject to the Graphic Arts Regulation 326 IAC 8-5-5 since this regulation only applies to Flexographic and Rotogravure Presses. The requirements of 326 IAC 8-2-5 requirements are not applicable to the two web offset lithographic printing presses EU10 and EU12. This rule corresponds to federal rule 40 CFR 60.440 (Subpart RR). The federal rule applies to pressure sensitive tape and label surface coating operations, and not to commercial printing operations where 100% of the substance is not covered. The requirements of 326 IAC 8-1-6 are not applicable to any of the presses, since the facilities with PTE of greater than 25 tons per year for which 8-1-6 might apply if emissions were not limited, (EU1, EU2, EU3, EU4, EU 10, and EU12), are limited to less than 25 tons of VOC's per rolling 12 month period so that 326 IAC 8-1-6 does not apply.

Compliance determination for all emitting units are based on record keeping and reporting requirements specified below:

The Permittee shall keep the following records to document compliance with the VOC emissions limitations:

(a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used each month;

(b) The VOC content (weight percent) of each material used each month;

(c) The weight of VOCs emitted for each per month.

The Permittee shall keep the following records to document compliance with the HAP emissions limitations

(a) The weight of HAP containing material used, including purchase orders and invoices necessary to verify the type and amount used each month;

(b) The HAP content (weight percent) of each material used each month;

(c) The weight of both individual and combined HAPs emitted for each month.

The Permittee shall submit a quarterly report which includes the following information;

(a) Monthly and 12 month rolling sum of VOC usage for emitting units EU1, EU2, EU3, EU4, EU10, and EU12.

(b) Monthly and 12 month rolling sum of VOC usage for all emitting units combined, and

(c) Monthly and 12 month rolling sum of combined sourcewide HAPs usage, as well as monthly and 12 month rolling sum usage of any individual HAP for which potential emissions sourcewide could exceed 10 tons per year.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to these units.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) FESOP Application Form GSD-08.

(a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act.

(b) See attached calculations in Appendix A, page for detailed air toxic calculations.

Conclusion

The operation of this stationary printing operation shall be subject to the conditions of the attached proposed FESOP No.: F097-12652-00318

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Sports Graphics

Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236

FESOP No.: 097-12652-00318

Plt ID: 00318

Reviewer: Dana Armstrong

Date: 03/12/01

S/V ID	Emission Unit ID	Manufacturer	Model Number	Install Date	Serial No./Brief Desc.	Maximum Unit Capacity	Units
N/A	1	Heidelberg	SO	October 1995	5 Color Press	10000	sheets/hr
N/A	2	Miehle Roland	N/A	1996	6 Color Press	10000	sheets/hr
N/A	3	Miehle	N/A	1996	4 Color Press	10000	sheets/hr
N/A	4	Heidelberg	SORDZ	October 1995	2 Color Press	8000	sheets/hr
N/A	5	Heidelberg	GTO	October 1995	GTO	8000	sheets/hr
N/A	6	Heidelberg	KORS	October 1995	KORS	5000	sheets/hr
N/A	7	AB Dick	9850	October 1995	AB Dick 9850 #1	10000	sheets/hr
N/A	8	AB Dick	9850	October 1995	AB Dick 9850 #2	10000	sheets/hr
N/A	9	Heidelberg	Windmill	October 1995	Letterpress	3000	sheets/hr
1	10	Harris	M110	October 1995	Heatset web press	40000	sheets/hr
N/A	12	Color King		January 2000	Coldset Web Press	12000	sheets/hr

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Sports Graphics

Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236

FESOP No.: 097-12652-00318

Plt ID: 00318

Reviewer: Dana Armstrong

Date: 03/13/01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length (inches)	Maximum Line Speed (feet/min)	Convert feet to inches	Maximum Print Width (inches)	60 min/hour	8760 hours/yr	1/1000000	Throughput Mmin^2/year#
5 Color Press	10000	28	388.88889	12	40	60	8760	1000000	98112

#Throughput=Maximum line speed(ft/min)*12inches/foot*Maximum print width*60min/hour*8760hours/yr*1/1000000conversion

Category Name	Maximum Coverage lbs/MMin^2 *	Weight % Volatiles **	Flash Off % ***	Throughput MMin^2/yr	2000 lbs/ton	Maximum % Operation Time	VOC Emissions (tons/yr) ****
Inks(Braden Sutphin Sheet Fed)	1.25	19.80%	5.00%	98112	2000	100.00%	0.61
Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	98112	2000	100.00%	0.49
Fountain Solution (Enhance 603	0.19	75.00%	100.00%	98112	2000	100.00%	6.99
Cleaning Solvents (Solvent Blend S-1100	0.71	100.00%	100.00%	98112	2000	100.00%	34.83
				98112	2000	100.00%	0.00
				98112	2000	100.00%	0.00
				98112	2000	100.00%	0.00
					Total VOC	→	42.91

* Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for this commercial printer

**Weight % Volatiles is determined from the MSDS for the "worst case" product within the appropriate category used on the identified press

***Flash off % is detemined fromthe EPA CTG Document for Offset Lithographic Printing

****VOC (tons per year) = Maximum coverage x Weight % Volatiles x Flash Off % x Throughput x 1 ton/2000 lbs x Maximum % operation time

PTE for HAPS

Specific Product Name	HAP Name	Maximum Coverage lbs/MMin^2	%HAP Content	Flash Off %	Maximum % Operation time	Throughput MMin^2/hr	Pounds/hr	Tons/yr
Enhance 63	Glycol Ethers	0.19	65.00%	80.00%	40.00%	11.2	0.442624	1.94
Aqua Etch 72A	Glycol Ethers	0.19	15.00%	80.00%	40.00%	11.2	0.102144	0.45
Rycoline Sta Open	1,1,1 Trichlorethane	0.19	10.00%	80.00%	20.00%	11.2	0.034048	0.15
Solvent Blend S-1100	Methylene Chloride	0.71	19.50%	80.00%	25.00%	11.2	0.310128	1.36
	Xylene	0.71	19.50%	80.00%	25.00%	11.2	0.310128	1.36
Rycoline Rycolite	Methyl Alcohol	0.71	15.00%	80.00%	25.00%	11.2	0.23856	1.04
	Toluene	0.71	25.00%	80.00%	25.00%	11.2	0.3976	1.74
One Step Wash Up	Cumene	0.71	2.50%	80.00%	25.00%	11.2	0.03976	0.17
	Glycol Ethers	0.71	7.50%	80.00%	25.00%	11.2	0.11928	0.52
	Xylene	0.71	3.50%	80.00%	25.00%	11.2	0.055664	0.24
KO #1 Wash Up	Naphthalene	0.71	10.00%	80.00%	25.00%	11.2	0.15904	0.70
	Toluene	0.71	0.01%	80.00%	25.00%	11.2	0.00015904	0.00
							0	0.00
							Total HAPs	9.68

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Sports Graphics

Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236

FESOP No.: 097-12652-00318

Plt ID: 00318

Reviewer: Dana Armstrong

Date: 03/13/01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length (inches)	Maximum Line Speed (feet/min)	Convert feet to inches	Maximum Print Width (inches)	60 min/hour	8760 hours/yr	1/1000000	Throughput Mmin^2/year#
6 Color Press	10000	28	388.88889	12	40	60	8760	1000000	98112

#Throughput=Maximum line speed(ft/min)*12inches/foot*Maximum print width*60min/hour*8760hours/yr*1/1000000conversion

Category Name	Maximum Coverage lbs/MMin^2 *	Weight % Volatiles **	Flash Off % ***	Throughput MMin^2/yr	2000 lbs/ton	Maximum % Operation Time	VOC Emissions (tons/yr) ****
Inks(Braden Sutphin Sheet Fed)	1.25	19.80%	5.00%	98112	2000	100.00%	0.61
Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	98112	2000	100.00%	0.49
Fountain Solution (Enhance 603	0.19	75.00%	100.00%	98112	2000	100.00%	6.99
Cleaning Solvents (Solvent Blend S-1100	0.71	100.00%	100.00%	98112	2000	100.00%	34.83
				98112	2000	100.00%	0.00
				98112	2000	100.00%	0.00
				98112	2000	100.00%	0.00
					Total VOC	→	42.91

* Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for this commercial printer

**Weight % Volatiles is determined from the MSDS for the "worst case" product within the appropriate category used on the identified press

***Flash off % is detemined fromthe EPA CTG Document for Offset Lithographic Printing

****VOC (tons per year) = Maximum coverage x Weight % Volatiles x Flash Off % x Throughput x 1 ton/2000 lbs x Maximum % operation time

PTE for HAPS

Specific Product Name	HAP Name	Maximum Coverage lbs/MMin^2	%HAP Content	Flash Off %	Maximum % Operation time	Throughput MMin^2/hr	Pounds/hr	Tons/yr
Enhance 63	Glycol Ethers	0.19	65.00%	80.00%	40.00%	11.2	0.442624	1.94
Aqua Etch 72A	Glycol Ethers	0.19	15.00%	80.00%	40.00%	11.2	0.102144	0.45
Rycoline Sta Open	1,1,1 Trichlorethane	0.19	10.00%	80.00%	20.00%	11.2	0.034048	0.15
Solvent Blend S-1100	Methylene Chloride	0.71	19.50%	80.00%	25.00%	11.2	0.310128	1.36
	Xylene	0.71	19.50%	80.00%	25.00%	11.2	0.310128	1.36
Rycoline Rycolite	Methyl Alcohol	0.71	15.00%	80.00%	25.00%	11.2	0.23856	1.04
	Toluene	0.71	25.00%	80.00%	25.00%	11.2	0.3976	1.74
One Step Wash Up	Cumene	0.71	2.50%	80.00%	25.00%	11.2	0.03976	0.17
	Glycol Ethers	0.71	7.50%	80.00%	25.00%	11.2	0.11928	0.52
	Xylene	0.71	3.50%	80.00%	25.00%	11.2	0.055664	0.24
KO #1 Wash Up	Naphthalene	0.71	10.00%	80.00%	25.00%	11.2	0.15904	0.70
	Toluene	0.71	0.01%	80.00%	25.00%	11.2	0.00015904	0.00
							0	0.00
							Total HAPs	9.68

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Sports Graphics

Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236

FESOP No.: 097-12652-00318

Plt ID: 00318

Reviewer: Dana Armstrong

Date: 03/13/01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length (inches)	Maximum Line Speed (feet/min)	Convert feet to inches	Maximum Print Width (inches)	60 min/hour	8760 hours/yr	1/1000000	Throughput Mmin^2/year#
4 Color Press	10000	28	388.88889	12	40	60	8760	1000000	98112

#Throughput=Maximum line speed(ft/min)*12inches/foot*Maximum print width*60min/hour*8760hours/yr*1/1000000conversion

Category Name	Maximum Coverage lbs/MMin^2 *	Weight % Volatiles **	Flash Off % ***	Throughput MMin^2/yr	2000 lbs/ton	Maximum % Operation Time	VOC Emissions (tons/yr) ****
Inks(Braden Sutphin Sheet Fed)	1.25	19.80%	5.00%	98112	2000	100.00%	0.61
Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	98112	2000	100.00%	0.49
Fountain Solution (Enhance 603	0.19	75.00%	100.00%	98112	2000	100.00%	6.99
Cleaning Solvents (Solvent Blend S-1100	0.71	100.00%	100.00%	98112	2000	100.00%	34.83
				98112	2000	100.00%	0.00
				98112	2000	100.00%	0.00
				98112	2000	100.00%	0.00
					Total VOC	→	42.91

* Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for this commercial printer

**Weight % Volatiles is determined from the MSDS for the "worst case" product within the appropriate category used on the identified press

***Flash off % is detemined fromthe EPA CTG Document for Offset Lithographic Printing

****VOC (tons per year) = Maximum coverage x Weight % Volatiles x Flash Off % x Throughput x 1 ton/2000 lbs x Maximum % operation time

PTE for HAPS

Specific Product Name	HAP Name	Maximum Coverage lbs/MMin^2	%HAP Content	Flash Off %	Maximum % Operation time	Throughput MMin^2/hr	Pounds/hr	Tons/yr
Enhance 63	Glycol Ethers	0.19	65.00%	80.00%	40.00%	11.2	0.442624	1.94
Aqua Etch 72A	Glycol Ethers	0.19	15.00%	80.00%	40.00%	11.2	0.102144	0.45
Rycoline Sta Open	1,1,1 Trichlorethane	0.19	10.00%	80.00%	20.00%	11.2	0.034048	0.15
Solvent Blend S-1100	Methylene Chloride	0.71	19.50%	80.00%	25.00%	11.2	0.310128	1.36
	Xylene	0.71	19.50%	80.00%	25.00%	11.2	0.310128	1.36
Rycoline Rycolite	Methyl Alcohol	0.71	15.00%	80.00%	25.00%	11.2	0.23856	1.04
	Toluene	0.71	25.00%	80.00%	25.00%	11.2	0.3976	1.74
One Step Wash Up	Cumene	0.71	2.50%	80.00%	25.00%	11.2	0.03976	0.17
	Glycol Ethers	0.71	7.50%	80.00%	25.00%	11.2	0.11928	0.52
	Xylene	0.71	3.50%	80.00%	25.00%	11.2	0.055664	0.24
KO #1 Wash Up	Naphthalene	0.71	10.00%	80.00%	25.00%	11.2	0.15904	0.70
	Toluene	0.71	0.01%	80.00%	25.00%	11.2	0.00015904	0.00
							0	0.00
							Total HAPs	9.68

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Sports Graphics

Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236

FESOP No.: 097-12652-00318

Plt ID: 00318

Reviewer: Dana Armstrong

Date: 03/13/01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length (inches)	Maximum Line Speed (feet/min)	Convert feet to inches	Maximum Print Width (inches)	60 min/hour	8760 hours/yr	1/1000000	Throughput Mmin^2/year#
2 Color Press	8000	36	400	12	24	60	8760	1000000	60549.12

#Throughput=Maximum line speed(ft/min)*12inches/foot*Maximum print width*60min/hour*8760hours/yr*1/1000000conversion

Category Name	Maximum Coverage lbs/MMin^2 *	Weight % Volatiles **	Flash Off % ***	Throughput MMin^2/yr	2000 lbs/ton	Maximum % Operation Time	VOC Emissions (tons/yr) ****
Inks(Braden Sutphin Sheet Fed)	1.25	19.80%	5.00%	60549.12	2000	100.00%	0.37
Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	60549.12	2000	100.00%	0.30
Fountain Solution (Enhance 603	0.19	67.50%	100.00%	60549.12	2000	100.00%	3.88
Cleaning Solvents (Solvent Blend S-1100	0.71	100.00%	100.00%	60549.12	2000	100.00%	21.49
				60549.12	2000	100.00%	0.00
				60549.12	2000	100.00%	0.00
				60549.12	2000	100.00%	0.00
					Total VOC	→	26.05

* Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for this commercial printer

**Weight % Volatiles is determined from the MSDS for the "worst case" product within the appropriate category used on the identified press

***Flash off % is detemined fromthe EPA CTG Document for Offset Lithographic Printing

****VOC (tons per year) = Maximum coverage x Weight % Volatiles x Flash Off % x Throughput x 1 ton/2000 lbs x Maximum % operation time

PTE for HAPS

Specific Product Name	HAP Name	Maximum Coverage lbs/MMin^2	%HAP Content	Flash Off %	Maximum % Operation time	Throughput MMin^2/hr	Pounds/hr	Tons/yr
Solvent Blend S-1100	Methylene Chloride	0.71	19.50%	80.00%	25.00%	6.912	0.19139328	0.84
	Xylene	0.71	19.50%	80.00%	25.00%	6.912	0.19139328	0.84
Rycoline Rycolite	Methyl Alcohol	0.71	15.00%	80.00%	25.00%	6.912	0.1472256	0.64
	Toluene	0.71	25.00%	80.00%	25.00%	6.912	0.245376	1.07
One Step Wash Up	Cumene	0.71	2.50%	80.00%	25.00%	6.912	0.0245376	0.11
	Glycol Ethers	0.71	7.50%	80.00%	25.00%	6.912	0.0736128	0.32
	Xylene	0.71	3.50%	80.00%	25.00%	6.912	0.03435264	0.15
KO #1 Wash Up	Naphthalene	0.71	10.00%	80.00%	25.00%	6.912	0.0981504	0.43
	Toluene	0.71	0.01%	80.00%	25.00%	6.912	9.81504E-05	0.00
						6.912	0	0.00
						6.912	0	0.00
						6.912	0	0.00
						6.912	0	0.00
							Total HAPs	4.41

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Sports Graphics
Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236
FESOP No.: 097-12652-00318
Plt ID: 00318
Reviewer: Dana Armstrong
Date: 03/13/01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length (inches)	Maximum Line Speed (feet/min)	Convert feet to inches	Maximum Print Width (inches)	60 min/hour	8760 hours/yr	1/1000000	Throughput Mmin^2/year#
GTO	8000	20	222.22222	12	14	60	8760	1000000	19622.4

#Throughput=Maximum line speed(ft/min)*12inches/foot*Maximum print width*60min/hour*8760hours/yr*1/1000000conversion

Category Name	Maximum Coverage lbs/MMin^2 *	Weight % Volatiles **	Flash Off % ***	Throughput MMin^2/yr	2000 lbs/ton	Maximum % Operation Time	VOC Emissions (tons/yr) ****
Inks(Braden Sutphin Sheet Fed)	1.25	19.80%	5.00%	19622.4	2000	100.00%	0.12
Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	19622.4	2000	100.00%	0.10
Fountain Solution (Enhance 603	0.19	75.00%	100.00%	19622.4	2000	100.00%	1.40
Cleaning Solvents (Solvent Blend S-1100	0.71	100.00%	100.00%	19622.4	2000	100.00%	6.97
				19622.4	2000	100.00%	0.00
				19622.4	2000	100.00%	0.00
				19622.4	2000	100.00%	0.00
					Total VOC	→	8.58

* Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for this commercial printer

**Weight % Volatiles is determined from the MSDS for the "worst case" product within the appropriate category used on the identified press

***Flash off % is detemined fromthe EPA CTG Document for Offset Lithographic Printing

****VOC (tons per year) = Maximum coverage x Weight % Volatiles x Flash Off % x Throughput x 1 ton/2000 lbs x Maximum % operation time

PTE for HAPS

Specific Product Name	HAP Name	Maximum Coverage lbs/MMin^2	%HAP Content	Flash Off %	Maximum % Operation time	Throughput MMin^2/hr	Pounds/hr	Tons/yr
Enhance 63	Glycol Ethers	0.19	65.00%	80.00%	40.00%	2.24	0.0885248	0.39
Aqua Etch 72A	Glycol Ethers	0.19	15.00%	80.00%	40.00%	2.24	0.0204288	0.09
Rycoline Sta Open	1,1,1 Trichlorethane	0.19	10.00%	80.00%	20.00%	2.24	0.0068096	0.03
Solvent Blend S-1100	Methylene Chloride	0.71	19.50%	80.00%	25.00%	2.24	0.0620256	0.27
	Xylene	0.71	19.50%	80.00%	25.00%	2.24	0.0620256	0.27
Rycoline Rycolite	Methyl Alcohol	0.71	15.00%	80.00%	25.00%	2.24	0.047712	0.21
	Toluene	0.71	25.00%	80.00%	25.00%	2.24	0.07952	0.35
One Step Wash Up	Cumene	0.71	2.50%	80.00%	25.00%	2.24	0.007952	0.03
	Glycol Ethers	0.71	7.50%	80.00%	25.00%	2.24	0.023856	0.10
	Xylene	0.71	3.50%	80.00%	25.00%	2.24	0.0111328	0.05
KO #1 Wash Up	Naphthalene	0.71	10.00%	80.00%	25.00%	2.24	0.031808	0.14
	Toluene	0.71	0.01%	80.00%	25.00%	2.24	0.000031808	0.00
							0	0.00
							Total HAPs	1.94

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Sports Graphics

Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236

FESOP No.: 097-12652-00318

Plt ID: 00318

Reviewer: Dana Armstrong

Date: 03/13/01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length (inches)	Maximum Line Speed (feet/min)	Convert feet to inches	Maximum Print Width (inches)	60 min/hour	8760 hours/yr	1/1000000	Throughput Mmin^2/year#
KORS	5000	28	194.44444	12	20	60	8760	1000000	24528

#Throughput=Maximum line speed(ft/min)*12inches/foot*Maximum print width*60min/hour*8760hours/yr*1/1000000conversion

Category Name	Maximum Coverage lbs/MMin^2 *	Weight % Volatiles **	Flash Off % ***	Throughput MMin^2/yr	2000 lbs/ton	Maximum % Operation Time	VOC Emissions (tons/yr) ****
Inks(Braden Sutphin Sheet Fed)	1.25	19.80%	5.00%	24528	2000	100.00%	0.15
Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	24528	2000	100.00%	0.12
Fountain Solution (Enhance 603	0.19	75.00%	100.00%	24528	2000	100.00%	1.75
Cleaning Solvents (Solvent Blend S-1100	0.71	100.00%	100.00%	24528	2000	100.00%	8.71
				24528	2000	100.00%	0.00
				24528	2000	100.00%	0.00
				24528	2000	100.00%	0.00
					Total VOC	→	10.73

* Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for this commercial printer

**Weight % Volatiles is determined from the MSDS for the "worst case" product within the appropriate category used on the identified press

***Flash off % is detemined fromthe EPA CTG Document for Offset Lithographic Printing

****VOC (tons per year) = Maximum coverage x Weight % Volatiles x Flash Off % x Throughput x 1 ton/2000 lbs x Maximum % operation time

PTE for HAPS

Specific Product Name	HAP Name	Maximum Coverage lbs/MMin^2	%HAP Content	Flash Off %	Maximum % Operation time	Throughput MMin^2/hr	Pounds/hr	Tons/yr
Enhance 63	Glycol Ethers	0.19	65.00%	80.00%	40.00%	2.8	0.110656	0.48
Aqua Etch 72A	Glycol Ethers	0.19	15.00%	80.00%	40.00%	2.8	0.025536	0.11
Rycoline Sta Open	1,1,1 Trichlorethane	0.19	10.00%	80.00%	20.00%	2.8	0.008512	0.04
Solvent Blend S-1100	Methylene Chloride	0.71	19.50%	80.00%	25.00%	2.8	0.077532	0.34
	Xylene	0.71	19.50%	80.00%	25.00%	2.8	0.077532	0.34
Rycoline Rycolite	Methyl Alcohol	0.71	15.00%	80.00%	25.00%	2.8	0.05964	0.26
	Toluene	0.71	25.00%	80.00%	25.00%	2.8	0.0994	0.44
One Step Wash Up	Cumene	0.71	2.50%	80.00%	25.00%	2.8	0.00994	0.04
	Glycol Ethers	0.71	7.50%	80.00%	25.00%	2.8	0.02982	0.13
	Xylene	0.71	3.50%	80.00%	25.00%	2.8	0.013916	0.06
KO #1 Wash Up	Naphthalene	0.71	10.00%	80.00%	25.00%	2.8	0.03976	0.17
	Toluene	0.71	0.01%	80.00%	25.00%	2.8	0.00003976	0.00
							0	0.00
							Total HAPs	2.42

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Sports Graphics
Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236
FESOP No.: 097-12652-00318
Plt ID: 00318
Reviewer: Dana Armstrong
Date: 03/13/01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length (inches)	Maximum Line Speed (feet/min)	Convert feet to inches	Maximum Print Width (inches)	60 min/hour	8760 hours/yr	1/1000000	Throughput Mmin^2/year#
AB Dick 9850 #1	10000	18	250	12	12	60	8760	1000000	18921.6

#Throughput=Maximum line speed(ft/min)*12inches/foot*Maximum print width*60min/hour*8760hours/yr*1/1000000conversion

Category Name	Maximum Coverage lbs/MMin^2 *	Weight % Volatiles **	Flash Off % ***	Throughput MMin^2/yr	2000 lbs/ton	Maximum % Operation Time	VOC Emissions (tons/yr) ****
Inks(Braden Sutphin Sheet Fed)	1.25	19.80%	5.00%	18921.6	2000	100.00%	0.12
Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	18921.6	2000	100.00%	0.09
Fountain Solution (Enhance 603	0.19	75.00%	100.00%	18921.6	2000	100.00%	1.35
Cleaning Solvents (Solvent Blend S-1100	0.71	100.00%	100.00%	18921.6	2000	100.00%	6.72
				18921.6	2000	100.00%	0.00
				18921.6	2000	100.00%	0.00
				18921.6	2000	100.00%	0.00
					Total VOC	→	8.28

* Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for this commercial printer

**Weight % Volatiles is determined from the MSDS for the "worst case" product within the appropriate category used on the identified press

***Flash off % is detemined fromthe EPA CTG Document for Offset Lithographic Printing

****VOC (tons per year) = Maximum coverage x Weight % Volatiles x Flash Off % x Throughput x 1 ton/2000 lbs x Maximum % operation time

PTE for HAPS

Specific Product Name	HAP Name	Maximum Coverage lbs/MMin^2	%HAP Content	Flash Off %	Maximum % Operation time	Throughput MMin^2/hr	Pounds/hr	Tons/yr
Enhance 63	Glycol Ethers	0.19	65.00%	80.00%	40.00%	2.16	0.0853632	0.37
Aqua Etch 72A	Glycol Ethers	0.19	15.00%	80.00%	40.00%	2.16	0.0196992	0.09
Rycoline Sta Open	1,1,1 Trichlorethane	0.19	10.00%	80.00%	20.00%	2.16	0.0065664	0.03
Solvent Blend S-1100	Methylene Chloride	0.71	19.50%	80.00%	25.00%	2.16	0.0598104	0.26
	Xylene	0.71	19.50%	80.00%	25.00%	2.16	0.0598104	0.26
Rycoline Rycolite	Methyl Alcohol	0.71	15.00%	80.00%	25.00%	2.16	0.046008	0.20
	Toluene	0.71	25.00%	80.00%	25.00%	2.16	0.07668	0.34
One Step Wash Up	Cumene	0.71	2.50%	80.00%	25.00%	2.16	0.007668	0.03
	Glycol Ethers	0.71	7.50%	80.00%	25.00%	2.16	0.023004	0.10
	Xylene	0.71	3.50%	80.00%	25.00%	2.16	0.0107352	0.05
KO #1 Wash Up	Naphthalene	0.71	10.00%	80.00%	25.00%	2.16	0.030672	0.13
	Toluene	0.71	0.01%	80.00%	25.00%	2.16	0.000030672	0.00
							0	0.00
							Total HAPs	1.87

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Sports Graphics
Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236
FESOP No.: 097-12652-00318
Plt ID: 00318
Reviewer: Dana Armstrong
Date: 03/13/01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length (inches)	Maximum Line Speed (feet/min)	Convert feet to inches	Maximum Print Width (inches)	60 min/hour	8760 hours/yr	1/1000000	Throughput Mmin^2/year#
AB Dick 9850 #2	10000	18	250	12	12	60	8760	1000000	18921.6

#Throughput=Maximum line speed(ft/min)*12inches/foot*Maximum print width*60min/hour*8760hours/yr*1/1000000conversion

Category Name	Maximum Coverage lbs/MMin^2 *	Weight % Volatiles **	Flash Off % ***	Throughput MMin^2/yr	2000 lbs/ton	Maximum % Operation Time	VOC Emissions (tons/yr) ****
Inks(Braden Sutphin Sheet Fed)	1.25	19.80%	5.00%	18921.6	2000	100.00%	0.12
Coating (Braden Overprint Varnish)	0.05	19.80%	100.00%	18921.6	2000	100.00%	0.09
Fountain Solution (Enhance 603	0.19	75.00%	100.00%	18921.6	2000	100.00%	1.35
Cleaning Solvents (Solvent Blend S-1100	0.71	100.00%	100.00%	18921.6	2000	100.00%	6.72
				18921.6	2000	100.00%	0.00
				18921.6	2000	100.00%	0.00
				18921.6	2000	100.00%	0.00
					Total VOC	→	8.28

* Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for this commercial printer

**Weight % Volatiles is determined from the MSDS for the "worst case" product within the appropriate category used on the identified press

***Flash off % is detemined fromthe EPA CTG Document for Offset Lithographic Printing

****VOC (tons per year) = Maximum coverage x Weight % Volatiles x Flash Off % x Throughput x 1 ton/2000 lbs x Maximum % operation time

PTE for HAPS

Specific Product Name	HAP Name	Maximum Coverage lbs/MMin^2	%HAP Content	Flash Off %	Maximum % Operation time	Throughput MMin^2/hr	Pounds/hr	Tons/yr
Enhance 63	Glycol Ethers	0.19	65.00%	80.00%	40.00%	2.16	0.0853632	0.37
Aqua Etch 72A	Glycol Ethers	0.19	15.00%	80.00%	40.00%	2.16	0.0196992	0.09
Rycoline Sta Open	1,1,1 Trichlorethane	0.19	10.00%	80.00%	20.00%	2.16	0.0065664	0.03
Solvent Blend S-1100	Methylene Chloride	0.71	19.50%	80.00%	25.00%	2.16	0.0598104	0.26
	Xylene	0.71	19.50%	80.00%	25.00%	2.16	0.0598104	0.26
Rycoline Rycolite	Methyl Alcohol	0.71	15.00%	80.00%	25.00%	2.16	0.046008	0.20
	Toluene	0.71	25.00%	80.00%	25.00%	2.16	0.07668	0.34
One Step Wash Up	Cumene	0.71	2.50%	80.00%	25.00%	2.16	0.007668	0.03
	Glycol Ethers	0.71	7.50%	80.00%	25.00%	2.16	0.023004	0.10
	Xylene	0.71	3.50%	80.00%	25.00%	2.16	0.0107352	0.05
KO #1 Wash Up	Naphthalene	0.71	10.00%	80.00%	25.00%	2.16	0.030672	0.13
	Toluene	0.71	0.01%	80.00%	25.00%	2.16	0.000030672	0.00
							0	0.00
							Total HAPs	1.87

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Sports Graphics
Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236
FESOP No.: 097-12652-00318
Plt ID: 00318
Reviewer: Dana Armstrong
Date: 03/13/01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length (inches)	Maximum Line Speed (feet/min)	Convert feet to inches	Maximum Print Width (inches)	60 min/hour	8760 hours/yr	1/1000000	Throughput Mmin^2/year#
Letterpress	3000	15	62.5	12	10	60	8760	1000000	3942

#Throughput=Maximum line speed(ft/min)*12inches/foot*Maximum print width*60min/hour*8760hours/yr*1/1000000conversion

Category Name	Maximum Coverage lbs/MMin^2 *	Weight % Volatiles **	Flash Off % ***	Throughput MMin^2/yr	2000 lbs/ton	Maximum % Operation Time	VOC Emissions (tons/yr) ****
Inks(Braden Sutphin Sheet Fed)	1.25	19.80%	5.00%	3942	2000	100.00%	0.02
Fountain Solution (Enhance 603	0.19	75.00%	100.00%	3942	2000	100.00%	0.28
Cleaning Solvents (Solvent Blend S-1100	0.71	100.00%	100.00%	3942	2000	100.00%	1.40
				3942	2000	100.00%	0.00
				3942	2000	100.00%	0.00
				3942	2000	100.00%	0.00
					Total VOC	→	1.70

* Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for this commercial printer

**Weight % Volatiles is determined from the MSDS for the "worst case" product within the appropriate category used on the identified press

***Flash off % is detemined fromthe EPA CTG Document for Offset Lithographic Printing

****VOC (tons per year) = Maximum coverage x Weight % Volatiles x Flash Off % x Throughput x 1 ton/2000 lbs x Maximum % operation time

PTE for HAPS

Specific Product Name	HAP Name	Maximum Coverage lbs/MMin^2	%HAP Content	Flash Off %	Maximum % Operation time	Throughput MMin^2/hr	Pounds/hr	Tons/yr
Enhance 63	Glycol Ethers	0.19	65.00%	80.00%	50.00%	0.45	0.02223	0.10
Aqua Etch 72A	Glycol Ethers	0.19	15.00%	80.00%	50.00%	0.45	0.00513	0.02
Solvent Blend S-1100	Methylene Chloride	0.71	19.50%	80.00%	25.00%	0.45	0.0124605	0.05
	Xylene	0.71	19.50%	80.00%	25.00%	0.45	0.0124605	0.05
Rycoline Rycolite	Methyl Alcohol	0.71	15.00%	80.00%	25.00%	0.45	0.009585	0.04
	Toluene	0.71	25.00%	80.00%	25.00%	0.45	0.015975	0.07
One Step Wash Up	Cumene	0.71	2.50%	80.00%	25.00%	0.45	0.0015975	0.01
	Glycol Ethers	0.71	7.50%	80.00%	25.00%	0.45	0.0047925	0.02
	Xylene	0.71	3.50%	80.00%	25.00%	0.45	0.0022365	0.01
KO #1 Wash Up	Naphthalene	0.71	10.00%	80.00%	25.00%	0.45	0.00639	0.03
	Toluene	0.71	0.01%	80.00%	25.00%	0.45	0.00000639	0.00
							0	0.00
							Total HAPs	0.41

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Sports Graphics

Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236

FESOP No.: 097-12652-00318

Plt ID: 00318

Reviewer: Dana Armstrong

Date: 03/13/01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length (inches)	Maximum Line Speed (feet/min)	Convert feet to inches	Maximum Print Width (inches)	60 min/hour	8760 hours/yr	1/1000000	Throughput Mmin^2/year #
Heatset web press	40000	na	986	12	28	60	8760	1000000	174129.1776

#Throughput=Maximum line speed(ft/min)*12inches/foot*Maximum print width*60min/hour*8760hours/yr*1/1000000conversion

Category Name	Maximum Coverage lbs/MMin^2 *	Weight % Volatiles **	Flash Off % ***	Throughput MMin^2/yr	2000 lbs/ton	Maximum % Operation Time	VOC Emissions (tons/yr) ****
Inks(Braden Web Heatset Commodore))	1.25	19.80%	85.00%	174129.178	2000	100.00%	18.32
Fountain Solution (Enhance 603	0.19	75.00%	100.00%	174129.178	2000	100.00%	12.41
Cleaning Solvents (Solvent Blend S-1100	0.71	100.00%	100.00%	174129.178	2000	100.00%	61.82
				174129.178	2000	100.00%	0.00
				174129.178	2000	100.00%	0.00
				174129.178	2000	100.00%	0.00
					Total VOC	→	92.54

* Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for this commercial printer

**Weight % Volatiles is determined from the MSDS for the "worst case" product within the appropriate category used on the identified press

***Flash off % is detemined fromthe EPA CTG Document for Offset Lithographic Printing

****VOC (tons per year) = Maximum coverage x Weight % Volatiles x Flash Off % x Throughput x 1 ton/2000 lbs x Maximum % operation time

PTE for HAPS

Specific Product Name	HAP Name	Maximum Coverage lbs/MMin^2	%HAP Content	Flash Off %	Maximum % Operation time	Throughput MMin^2/hr	Pounds/hr	Tons/yr
Enhance 63	Glycol Ethers	0.19	65.00%	80.00%	50.00%	19.87776	0.981961344	4.30
Aqua Etch 72A	Glycol Ethers	0.19	15.00%	80.00%	50.00%	19.87776	0.226606464	0.99
Solvent Blend S-1100	Methylene Chloride	0.71	19.50%	80.00%	25.00%	19.87776	0.550415174	2.41
	Xylene	0.71	19.50%	80.00%	25.00%	19.87776	0.550415174	2.41
Rycoline Rycolite	Methyl Alcohol	0.71	15.00%	80.00%	25.00%	19.87776	0.423396288	1.85
	Toluene	0.71	25.00%	80.00%	25.00%	19.87776	0.70566048	3.09
One Step Wash Up	Cumene	0.71	2.50%	80.00%	25.00%	19.87776	0.070566048	0.31
	Glycol Ethers	0.71	7.50%	80.00%	25.00%	19.87776	0.211698144	0.93
	Xylene	0.71	3.50%	80.00%	25.00%	19.87776	0.098792467	0.43
KO #1 Wash Up	Naphthalene	0.71	10.00%	80.00%	25.00%	19.87776	0.282264192	1.24
	Toluene	0.71	0.01%	80.00%	25.00%	19.87776	0.000282264	0.00
							0	0.00
							Total HAPs	17.97

Appendix A: Emissions Calculations

VOC From Printing Press Operations

Company Name: Sports Graphics

Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236

FESOP No.: 097-12652-00318

Plt ID: 00318

Reviewer: Dana Armstrong

Date: 03/13/01

Throughput

Press ID	Impressions Per Hour	Maximum Sheet Length (inches)	Maximum Line Speed (feet/min)	Convert feet to inches	Maximum Print Width (inches)	60 min/hour	8760 hours/yr	1/1000000	Throughput Mmin^2/year#
Coldset Web Press	12000	na	389	12	36	60	8760	1000000	88326.0288

#Throughput=Maximum line speed(ft/min)*12inches/foot*Maximum print width*60min/hour*8760hours/yr*1/1000000conversion

Category Name	Maximum Coverage lbs/MMin^2 *	Weight % Volatiles **	Flash Off % ***	Throughput MMin^2/yr	2000 lbs/ton	Maximum % Operation Time	VOC Emissions (tons/yr) ****
Inks(Braden Coldset Web	1.25	0.00%	5.00%	88326.0288	2000	100.00%	0.00
Fountain Solution (Enhance 603	0.19	75.00%	100.00%	88326.0288	2000	100.00%	6.29
Cleaning Solvents (Solvent Blend S-1100	0.71	100.00%	100.00%	88326.0288	2000	100.00%	31.36
				88326.0288	2000	100.00%	0.00
				88326.0288	2000	100.00%	0.00
				88326.0288	2000	100.00%	0.00
					Total VOC	→	37.65

* Maximum coverage rate for each category is determined by the actual product usage increased by a safety factor to represent maximum usages for this commercial printer

**Weight % Volatiles is determined from the MSDS for the "worst case" product within the appropriate category used on the identified press

***Flash off % is detemined fromthe EPA CTG Document for Offset Lithographic Printing

****VOC (tons per year) = Maximum coverage x Weight % Volatiles x Flash Off % x Throughput x 1 ton/2000 lbs x Maximum % operation time

PTE for HAPS

Specific Product Name	HAP Name	Maximum Coverage lbs/MMin^2	%HAP Content	Flash Off %	Maximum % Operation time	Throughput MMin^2/hr	Pounds/hr	Tons/yr
Enhance 63	Glycol Ethers	0.19	65.00%	80.00%	50.00%	10.08288	0.498094272	2.18
Aqua Etch 72A	Glycol Ethers	0.19	15.00%	80.00%	50.00%	10.08288	0.114944832	0.50
Solvent Blend S-1100	Methylene Chloride	0.71	19.50%	80.00%	25.00%	10.08288	0.279194947	1.22
	Xylene	0.71	19.50%	80.00%	25.00%	10.08288	0.279194947	1.22
Rycoline Rycolite	Methyl Alcohol	0.71	15.00%	80.00%	25.00%	10.08288	0.214765344	0.94
	Toluene	0.71	25.00%	80.00%	25.00%	10.08288	0.35794224	1.57
One Step Wash Up	Cumene	0.71	2.50%	80.00%	25.00%	10.08288	0.035794224	0.16
	Glycol Ethers	0.71	7.50%	80.00%	25.00%	10.08288	0.107382672	0.47
	Xylene	0.71	3.50%	80.00%	25.00%	10.08288	0.050111914	0.22
KO #1 Wash Up	Naphthalene	0.71	10.00%	80.00%	25.00%	10.08288	0.143176896	0.63
	Toluene	0.71	0.01%	80.00%	25.00%	10.08288	0.000143177	0.00
							0	0.00
							Total HAPs	9.11

Potential To Emit

Emission Unit	PTE for VOCs	PTE for Comb.HAPs
EU1	42.91	9.68
EU2	42.91	9.68
EU3	42.91	9.68
EU4	26.05	4.41
EU5	8.58	1.94
EU6	10.73	2.42
EU7	8.28	1.87
EU8	8.28	1.87
EU9	1.70	0.41
EU10	92.54	17.97
EU12	37.65	9.11

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Sports Graphics
Address City IN Zip: 3423 Park Davis Circle, Indianapolis, In 46236
FESOP No.: 097-12652-00318
Plt ID: 00318
Reviewer: Dana Armstrong
Date: 03/13/01

Subtotal	**322.55**	**69.01**	**PM**	**NOx**	**SO2**	**CO**
EU11*	0.028	0	0.065	0.55	0.003	0.115
*Insignificant Emitting Unit						
Total	**322.57**	**69.01**	**0.07**	**0.55**	**0.00**	**0.12**

Limited Potential To Emit

	99, 24##	**10, 24 #**	**na**	**na**	**na**	**na**

#10 tons per year individual HAP, 24 tons per year combined HAPs

99 tons per year source wide VOC, 24 tons per year each for the following individual units: EU1, EU2, EU3, EU4, EU10, EU12.

Selected Sourcewide Individual HAPs***

Emission Units	Glycol Ethers	1,1,1 Trichlorethane	Methylene Chloride	Xylene	Methyl Alcohol	Toluene
EU1	2.91	0.15	1.36	1.60	1.04	1.74
EU2	2.91	0.15	1.36	1.60	1.04	1.74
EU3	2.91	0.15	1.36	1.60	1.04	1.74
EU4	0.32	0	0.84	1.27	0.64	1.08
EU5	0.58	0.03	0.27	0.32	0.21	0.35
EU6	0.73	0.04	0.34	0.40	0.26	0.44
EU7	0.56	0.03	0.26	0.31	0.20	0.34
EU8	0.71	0.03	0.26	0.31	0.20	0.34
EU9	0.11	0.00	0.09	0.06	0.26	0.31
EU10	6.22	0.00	0.09	0.06	0.26	0.31
EU12	3.16	0	0.09	0.06	0.26	0.31
Total	21.11	0.57	6.31	7.60	5.44	8.68

***Selection based on HAPs of greater than 10% in content.